



California Regional Water Quality Control Board

Central Coast Region

Linda S. Adams
Secretary for
Environmental Protection



Arnold Schwarzenegger
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August 4, 2009

Bill Albrecht
Public Works Director
City of Buellton
107 West Highway 246
Buellton, CA 93427

Dear Mr. Albrecht:

WATER BOARD STAFF COMMENTS ON CITY OF BUELLTON MARCH 2009 DRAFT STORMWATER MANAGEMENT PLAN, SANTA BARBARA COUNTY, WDID #3 42MS03016

On March 4, 2009, Central Coast Regional Water Quality Control Board (Water Board) received the City of Buellton (City) March 2009 Draft Stormwater Management Plan (SWMP). Water Board staff has reviewed the March 2009 Draft SWMP, and finds that the City has developed a stormwater management program with good breadth and depth. However, Water Board staff has also identified improvements the City must make before Water Board staff can recommend approval of the SWMP to the Water Board. We present the specific improvements that are needed in the attached Draft Table of Required Revisions. In addition, we have identified overarching issues with the SWMP that must be corrected, discussed directly below. Please respond with a revised SWMP addressing the Draft Table of Required Revisions and the issues discussed below.

SWMP Organization

Each chapter of the Draft SWMP describing a Minimum Control Measure contains a section describing Best Management Practices (BMPs), a section listing goals for each identified BMP, and a BMP implementation Table. In some cases, the different sections give divergent or conflicting information about the same BMP. Please revise the SWMP to provide consistency. In addition, placing BMP descriptions and goals in different sections of the SWMP is confusing and time-consuming to read. As part of your effort to make the SWMP internally consistent, we would like you to combine the description and goals for each BMP into a single section. Then each BMP would be described in only two places: the BMP description/goals section, and the BMP Implementation Table. Finally, Water Board staff finds that every statement in the SWMP is enforceable, whether or not that statement is expressed as a measurable goal in the BMP Implementation Table. For Water Board staff to regulate the City's program most effectively and efficiently, however, all stormwater activities should be included in the BMP Implementation Tables as BMPs and/or measurable goals.

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Measurable Goals and Effectiveness Measures

Several of the measurable goals contained in the SWMP must be made more specific, concrete, and quantifiable. Measurable goals are concrete numeric statements of specific actions the City will perform at (or by) particular times, detailing who will perform the action, how much of it, and how often. For example, a goal like "Distribute educational materials to businesses" does not provide enough detail, while the statement "Distribute brochure X to 20% of restaurants in the City every year through site inspections conducted by EHS staff" meets the definition of a measurable goal. In addition, some of the statements labeled by the SWMP as measurable goals are actually effectiveness measures. Whereas measurable goals indicate what the City will do, effectiveness measures describe how the city will measure its progress toward, or success at achieving, measurable goals. For example, a first-year effectiveness measure (prior to developing the program effectiveness assessment described below and in item 12 of the Table of Required Revisions) for the measurable goal described above might be to document the number and percentage of restaurants visited each year using a checklist that records the educational materials distributed during the visit. Please ensure that each BMP includes specific numeric measurable goals for each activity.

Pollutants of Concern:

The SWMP does not adequately identify and address pollutants of concern. While the SWMP mentions pollutants that appear on the Clean Water Act Section 303(d) list of impaired waters, it does not specifically identify other pollutants which are present, or have the potential to be present, in stormwater to a degree which threatens to cause nuisance or affect water quality. The SWMP must identify sediment as a primary pollutant of concern, and at least the following pollutants as secondary pollutants of concern: nutrients, herbicides, pesticides, pathogens, petroleum products, oil and grease, and trash. The SWMP must also identify the known and potential sources of these pollutants within the City. Potential sources for secondary pollutants of concern should include at least the following: pet waste, landscape chemicals, green waste, household hazardous wastes, residential vehicle maintenance, automobile service businesses, residential and commercial vehicle washing, restaurant wash-off, construction activities, parking lots, illegal dumping, used oil, garbage collection areas, septic systems, and litter.

In addition, the City must tailor BMPs to specifically target pollutants of concern and their sources. BMPs must target particular pollutants, and all primary and secondary pollutants of concern must be targeted by particular BMPs, to ensure that pollutants of concern are reduced in stormwater to the MEP. We request that you include a table in the SWMP that lists each primary and secondary pollutant of concern, its known and potential sources, and the BMPs the City will use to target it.

Assessment of Program Effectiveness

Operators of Municipal Separate Storm Sewer Systems (MS4s) are required to assess the appropriateness and effectiveness of their BMPs annually. While effectiveness measures are provided for most BMPs, the measurements assess only completion of tasks and not the

effectiveness of BMPs at raising awareness, changing behavior, reducing pollutants, improving runoff water quality, and protecting receiving water quality. Since the goal of the SWMP is to reduce pollutants and protect water quality, each BMP must include measures to quantify implementation and progress toward measurable goals, and measures to quantify the BMP's impact on water quality.

It is important to assess BMP and program effectiveness in detail so that the City's program evolves and improves over time. Therefore we expect SWMPs to include the following components:

1. Assessment of program effectiveness at complying with permit requirements and achieving measurable goals;
2. Assessment of program effectiveness at protecting and restoring water quality and beneficial uses;
3. Identification of quantifiable effectiveness measurements for each BMP, including measurements that link BMP implementation with improvement of water quality and beneficial use conditions;
4. Emphasis on assessment of BMPs specifically targeting primary pollutants of concern.
5. Incorporation of an effectiveness assessment process comparable to that outlined in the California Stormwater Quality Association's (CASQA) *Municipal Stormwater Program Effectiveness Assessment Guide*;
6. Identification of a range of quantifiable effectiveness measures, appropriate to each BMP, that assess effectiveness at achieving regulatory compliance, meeting measurable goals, changing awareness, changing behavior, and reducing pollutant loads, to be used during annual effectiveness assessments. The *Municipal Stormwater Program Effectiveness Assessment Guide* includes useful examples and guidance for assessing effectiveness using these parameters;
7. Identification of quantifiable effectiveness measurements that collectively assess effectiveness in terms of runoff and receiving water quality, to be used during long-term effectiveness assessments (e.g., every three to five years). The *Municipal Stormwater Program Effectiveness Assessment Guide* includes useful examples and guidance for assessing effectiveness using these parameters; and
8. Identification of the steps the City will take to revise the SWMP and optimize BMP effectiveness, when effectiveness assessments identify BMPs or program sub-areas that are ineffective or need improvement.

To the extent these components are already included in the SWMP or are readily available for inclusion, we expect you to keep them in the SWMP or incorporate them, and to use them in the first annual report's effectiveness assessment. However, we do not expect the revised SWMP to fully address each of the above components prior to approval. As an alternative, the SWMP must include a BMP to develop and implement an effectiveness assessment strategy. The effectiveness assessment strategy must address each of the items identified above. We also expect you to provide Level 1 effectiveness measurement ("Validating Actions") for each BMP, consistent with and relative to each BMP's measurable goal(s).

An example of the type of language you should include in the SWMP for such a BMP is as follows:

"The City will develop an effectiveness assessment strategy during the first full implementation year, and will submit the strategy as an update to the SWMP

with the first annual report. The City will use the effectiveness assessment strategy to conduct effectiveness assessments included in the annual reports, starting with the second annual report. Overall, the strategy will describe the actions the City will take to assess the effectiveness of the SWMP in meeting regulatory requirements and improving water quality and beneficial use conditions. The strategy will specifically 1) identify the measures the City will use to assess effectiveness and improve BMP implementation; 2) identify quantifiable effectiveness measurements for each BMP and for the program as a whole that link BMP implementation with improvement in water quality and beneficial use conditions; and 3) assess BMP implementation in terms of regulatory compliance, changing awareness, changing behavior, reducing pollutant loads, improving runoff water quality, and protecting receiving water quality."

Developing Interim Hydromodification Control Criteria as Effective as Water Board Staff's Proposed Criteria

One of the revisions the City must make to the SWMP is to add a BMP to develop interim hydromodification control criteria. (See item number 98 in the attached Table of Required Revisions.) In this letter, we are providing clarification regarding how interim hydromodification control criteria developed by the City will be reviewed by Water Board staff. At the recent Water Board public hearing for approval of the City of Lompoc's SWMP, Water Board staff was directed by the Water Board to ensure that any interim hydromodification control criteria developed by the City of Lompoc be as effective as the interim hydromodification control criteria we presented in our February 15, 2008 letter. Those criteria are as follows:

- For new and re-development projects, Effective Impervious Area shall be maintained at less than five percent (5%) of total project area.
- For new and redevelopment projects that create and/or replace 5,000 square feet or more of impervious surface, the post-construction runoff hydrographs shall match within one percent (1%) the pre-construction runoff hydrographs, for a range of events with return periods from 1-year to 10-years.
- For projects whose disturbed project area exceeds two acres, preserve the pre-construction drainage density (miles of stream length per square mile of watershed) for all drainage areas serving a first order stream or larger, and ensure that post-project time of concentration is equal or greater than pre-project time of concentration.

Based on the Water Board's direction regarding the City of Lompoc's SWMP, Water Board staff has determined it appropriate to require similar language in other municipalities' SWMPs. Therefore, Water Board staff has included language in the attached draft Table of Required Revisions requiring your interim hydromodification criteria to be as effective as the criteria outlined above. (See item number 98 in the attached Table of Required Revisions.) Water Board staff expects that implementation of these criteria, together with other planning efforts that contribute to long-term watershed protection, will promote the following desired conditions of healthy watersheds:

- 1) Rainfall surface runoff at pre-development levels;
- 2) Watershed storage of runoff, through infiltration, recharge, baseflow, and interflow, at pre-development levels;
- 3) Watercourse geomorphic regimes within natural ranges (stream banks are stable within natural range; sediment supply and transport within natural ranges); and
- 4) Optimal riparian and aquatic habitats.

Interim hydromodification control criteria primarily focus on items 1 and 2 above. Therefore, Water Board staff will review interim hydromodification control criteria developed by MS4s to ensure that they:

- 1) Provide numeric thresholds that demonstrate optimization of infiltration in order to approximate natural infiltration levels (such as would be achieved by implementation of appropriate low-impact development practices), and
- 2) Achieve post-project runoff discharge rates and durations that do not exceed estimated pre-project levels, where increased discharge rates and durations will result in increased potential for erosion or other significant adverse impacts to beneficial uses.

At the public hearing on the City of Lompoc SWMP, the Water Board also directed Water Board staff to provide an opportunity for comment on Water Board staff's eventual determination regarding the City of Lompoc's pending interim hydromodification control criteria, and a hearing, if requested, if any party is aggrieved by the determination. In other words, the criteria of the February 15, 2008 letter may only be used as a default set of criteria if the City of Lompoc does not, within one year, develop approvable interim hydromodification control criteria of their own that we agree are as effective as our stated interim criteria. If the City of Lompoc's proposed criteria are not as effective and we must further condition our approval (either to the exact numerics of our interim criteria or something in-between), **and** the City of Lompoc still finds those conditions unacceptable, the City of Lompoc and other parties will have an opportunity for a Water Board hearing. Water Board staff has determined that this process is beneficial and should be expanded to other municipalities. Therefore, we intend to follow this process during review and approval of the City of Buellton's SWMP.

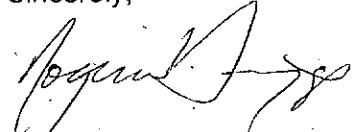
The City must make the modifications found above and in the attached **Draft Table of Required Revisions**. Please address all required revisions and submit a copy of your amended SWMP no later than September 11, 2009. We request two versions of the revised SWMP, one showing additions and deletions in underline and strikethrough format, and the other without underline and strikethrough formatting. Additionally, we request that you describe how the City addressed each of the revisions in the attached Draft Table of Required Revisions. Water Board staff recommends the City do this by adding a column to the attached Draft Table of Required Revisions containing the explanations. All materials may be submitted electronically (email to centralcoast@waterboards.ca.gov) or in hard copy. (If the City submits a hard copy, please print double-sided if possible, and submit the electronic version on a disk.)

Water Board staff will review your September 11 draft SWMP from September 11 to September 25 and develop a second Draft Table of Required Revisions if necessary. We will post the draft SWMP and Draft Table of Required Revisions on September 25 for a period of 60 days, during which any member of the public, including the City's staff and elected officials, can make comments or request a hearing before the Water Board. At the conclusion of the 60-day public comment period on November 27, Water Board staff will commence final preparation of a recommended action to approve the City's SWMP, including a response to comments and, if necessary, all preparations for a Water Board hearing in early February 2010.

August 4, 2009

If you have any questions regarding this matter, please call Jon Rohrbough at (805) 549-3458 or at jrohrbough@waterboards.ca.gov, or Phil Hammer at (805) 549-3882.

Sincerely,



Roger W. Briggs
Executive Officer

cc:

Shelly Ingram
Stormwater Compliance Officer
MNS Engineers
201 Industrial Way
Buellton, CA 93436

Attachment: Draft Table of Required Revisions

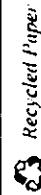
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DRAFT TABLE OF REQUIRED REVISIONS
City of Buellton Draft Stormwater Management Program (SWMP)

Acronyms/Abbreviations:

BMP	Best Management Practice
CEQA	California Environmental Quality Act
City	City of Buellton
LID	Low Impact Development
MEP	Maximum Extent Practicable
MS4	Municipal Separate Storm Sewer System
SWMP	Stormwater Management Program
SWPPP	Stormwater Pollution Prevention Plan
Water Board	Central Coast Regional Water Quality Control Board

Item Number	SWMP Section	Subject	Issue	Required Revision
1	1.3	General Permit	The SWMP states that a copy of the General Permit is included in Appendix A. However, Appendix A does not contain a copy of the General Permit.	If the SWMP will include a copy of the General Permit as an appendix, clarify which appendix will contain it.
2	1.4	Designation as a Regulated MS4	The SWMP states that the City was designated as a regulated MS4 because it meets the criteria specified in General Permit Finding 10.a and 10.b. However, the City was designated on the basis of General Permit finding 10.a and 10.d.	Modify the SWMP to accurately reflect the basis for the City's coverage under the General Permit.
3	1.5	Expectations for LID	The SWMP states that the Water Board recommends incorporation of LID strategies. However, the referenced February 15th letter from the Water Board to the City states that hydromodification control plans maximize the use of LID.	Modify the relevant section in the SWMP to state that the SWMP must incorporate LID strategies.
4	1.5	February 15 Letter	The SWMP states that a copy of the Water Board's letter to the City, dated 15 February 2008, is included in Appendix B. However, Appendix B does not contain a copy of the	If the SWMP will include a copy of the letter as an appendix, clarify which appendix will contain it.

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Item Number	SWMP Section	Subject	Issue	Required Revision
5	1.7	Responsible Parties	The SWMP does not identify a person, or persons, responsible for implementing each minimum control measure and the program as a whole. This information is required by General Permit Section D.4.	Identify the person, or persons (preferably by title rather than by name), who will be responsible for implementing or coordinating each minimum control measure and the program as a whole.
6	1.9	Appendix D	The SWMP states that a list of commercial and industrial facilities inspected by the City's Department of Public Works is included in Appendix D. However, the SWMP does not include Appendix D.	Include the list of commercial and industrial facilities inspected by the City's Department of Public Works as Appendix D.
7	Land Use	Misprint	The Land Use paragraph is obscured by a chart.	Remove the chart and place it in its appropriate location.
8	Watershed and Surface Waters	Pollutants of Concern	The SWMP does not include an analysis of pollutants of concern beyond impairments listed on the 303(d) list. Pollutants of concern are pollutants which are present, or have the potential to be present, in stormwater to a degree which threatens to cause nuisance or affect water quality. Identifying pollutants of concern enables the City to focus its efforts on the greatest threats to water quality.	Add a section to the SWMP which identifies pollutants of concern in the City's stormwater. The list should identify sediment as a primary pollutant of concern and the following pollutants as secondary pollutants of concern: nutrients, herbicides, pesticides, petroleum products, oil and grease, and trash.
				Include a table which lists the likely potential sources within the City for each pollutant of concern. The list should include at least the following potential sources: pet waste, landscape chemicals, green waste, household hazardous wastes, automobile services, vehicle washing, restaurant wash-off, construction activities, illegal dumping, used oil, garbage management, and litter.

Item Number	SWMP Section	Subject	Issue	Required Revision
9	Watershed and Surface Waters	Pollutants of Concern	The SWMP does not link BMPs to particular pollutants of concern or their potential sources. BMPs must target particular pollutants, and all pollutants of concern must be targeted by particular BMPs, to ensure that pollutants of concern are reduced in stormwater to the MEP.	Include a table listing the BMPs which target each pollutant of concern and/or potential source of a pollutant of concern.
10	Introduction	Identifying BMPs	BMPs do not have unique identifiers. This makes it hard to refer to them quickly and easily.	Give each BMP an identification number (such as "PE-1" for the first BMP in the Public Education section).
11	Introduction	SWMP Organization	For each BMP, the SWMP provides a description and measurable goals in separate sections. This is confusing and forces the reader to flip back and forth between the sections. In addition, there is frequent disagreement in the description and measurable goals of BMPs between the two sections and between the sections and the table.	Modify the SWMP's structure to combine the description and measurable goals for each BMP into a single section. Revise the BMP descriptions, implementation details, and measurable goals to provide clarity and consistency. In addition, show all activities, measurable goals, and effectiveness measures in the BMP Implementation Tables.
12	General Program	Effectiveness Assessment	The SWMP does not include a strategy to assess the effectiveness of the program at reducing pollutants in stormwater to the MEP and protecting water quality. The City must continually assess and modify its program to incorporate improvements in control measures and BMPs to achieve the MEP standard.	<p>Include a BMP to develop, by the end of year one, a detailed effectiveness assessment strategy for evaluating SWMP performance, incorporating the following components:</p> <ul style="list-style-type: none"> • Assessment of program effectiveness at complying with permit requirements and achieving measurable goals; • Assessment of program effectiveness at protecting and restoring water quality and beneficial uses; • Identification of quantifiable effectiveness measurements for each BMP, including measurements that link BMP implementation with improvement of water quality and beneficial use conditions;

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				<ul style="list-style-type: none"> • Emphasis on assessment of BMPs specifically targeting primary pollutants of concern; • Incorporation of an effectiveness assessment process comparable to that outlined in the California Stormwater Quality Association's (CASQA) <i>Municipal Stormwater Program Effectiveness Assessment Guide</i>; • Identification of a range of quantifiable effectiveness measures, appropriate to each BMP, that assess effectiveness at achieving regulatory compliance, meeting measurable goals, changing awareness, changing behavior, and reducing pollutant loads, to be used during annual effectiveness assessments. The <i>Municipal Stormwater Program Effectiveness Assessment Guide</i> includes useful examples and guidance for assessing effectiveness using these parameters; • Identification of quantifiable effectiveness measurements that collectively assess effectiveness in terms of runoff and receiving water quality, to be used during long-term effectiveness assessments (e.g., every three to five years). The <i>Municipal Stormwater Program Effectiveness Assessment Guide</i> includes useful examples and guidance for assessing effectiveness using these parameters; and • Identification of the steps the City will take to revise the SWMP and optimize BMP effectiveness, when effectiveness

Item Number	SWMP Section	Subject	Issue	Required Revision
13	1.1	Minimum Requirements	The SWMP cites USEPA Fact Sheet 2.3. However, this fact sheet does not address all of the minimum requirements stated in the General Permit. The SWMP must include a statement that the City will fulfill the minimum requirements of the Public Education and Outreach minimum control measure stated in the General Permit.	assessments identify BMPs or program sub-areas that are ineffective or need improvement. Include explicit statements that the City will develop educational materials which meet the following minimum requirements: <ul style="list-style-type: none">• Inform people of the impacts of stormwater discharges on waterbodies;• Inform people of the steps they can take to reduce pollutants in stormwater; and• Inform people how they can become involved in restoration activities.
14	Public Education & Outreach	The "Banner"	Currently the "Banner" activity is combined with the brochures, events and website as a single BMP. In addition, the "Banner" activity is described again (and somewhat differently) in the "Media Campaigns" paragraph. This is confusing and doesn't allow a distinct measurable goal for this activity.	Create a separate BMP, description, and measurable goal(s), for the "Banner" direct mailing activity. Include all content related to this activity in the BMP description and measurable goals. Clarify that the measurable goal is to conduct quarterly mailings to 100% of City residents and businesses.
15	Public Education & Outreach	Web Page	Currently the web page BMP is described in the "Alternative Information Sources" paragraph, and its implementation details and measurable goals are combined with the Brochures/Events/Direct Mail/"Banner" BMP. This is confusing and makes it difficult to locate information about the web page BMP.	Create a separate BMP, BMP description, measurable goal(s), and effective measure(s) for the City stormwater web page activity.
16	Public Education & Outreach	Brochures	Documenting website hits is an effectiveness measure, not a measurable goal.	Include this sentence in the BMP Implementation table as an effectiveness measure.
			The SWMP does not link public education materials to pollutants of concern and their sources. Therefore it is difficult to determine whether the public education program targets	Include a list of the pollutants of concern, potential pollutants of concern, and potential sources of pollution addressed by each brochure. If some pollutants or sources are not

Item Number	SWMP Section	Subject	Issue	Required Revision
		pollutants of concern and achieves the MEP standard.	adequately addressed, add a BMP or BMPS to create additional brochures to target those pollutants and sources. At a minimum, the brochures should address the following topics for homeowners: residential vehicle washing, automobile maintenance, use and disposal of landscape maintenance chemicals (fertilizers, herbicides, and pesticides), disposal of green wastes, use and disposal of household hazardous materials (including used oil and paint), pet waste, and litter.	
17	Public Education & Outreach	Events	The SWMP states that the City will distribute brochures at events. However, the SWMP does not include a specific numeric measurable goal to attend any events.	Create a separate BMP, BMP description, measurable goal(s), and implementation schedule for event participation.
18	Public Education & Outreach	Brochures	Events are mentioned in the "Brochures" paragraph and in the "Event participation" paragraph. This is confusing and redundant. All information related to a particular activity/BMP should be grouped together.	Delete this effectiveness measure and develop a new measure as part of the City's program effectiveness assessment strategy.

Item Number	SWMP Section	Subject	Issue	Required Revision
19	Public Education & Outreach	Park Clean-Up	Currently the park clean-up activity is combined with the educational programs for children activity as a single BMP. This is confusing and doesn't allow a distinct measurable goal for each activity. In addition, the SWMP does not provide implementation details or measurable goal(s) for the park clean-up activity.	Create a separate BMP, description, and measurable goal(s) for the park clean-up activity. Provide specific, numeric measurable goals for this BMP.
20	Public Education & Outreach	Stormwater Exhibit	Currently the stormwater exhibit activity is combined with the educational programs for children activity as a single BMP. In addition, the SWMP does not provide measurable goal(s) for this activity.	Create a separate BMP, description, and measurable goal(s) for the stormwater exhibit activity. Include specific, numeric measurable goals for this BMP.
21	Public Education & Outreach	Educational Programs for School Children	The SWMP states that the City will educate 50% of school children every two years. However, the implementation plan for this activity mentions only distributing materials to teachers. Distribution alone cannot guarantee the students will receive stormwater education.	Provide an implementation plan for educating school children to achieve the measurable goal. The plan should include specific numeric measurable goals for the number of children educated per year.

The measurable goal in Section 1.3 disagrees with the measurable goal in Table 1-1.

Modify the statements in Section 1.3 and the BMP Implementation table so the measurable goals agree. Include all measurable goals in the BMP Implementation table.

Include these statements in the BMP Implementation table as effectiveness measures.

Compiling the number of informational books distributed and the number of entrants in the art contest are effectiveness measures, not measurable goals.

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22	Public Education & Outreach	Storm Drain Marking	The measurable goals in Section 1.3 disagree with the measurable goals in the BMP Implementation table.	Modify the BMP implementation table to include the following measurable goals: <ul style="list-style-type: none">• Install decals on 30% of City storm drain inlets each year (years 1 through 3);• Mark all storm drain inlets in the City by the end of year 3; and• Maintain storm drain decals in the City by checking decals annually and replacing as necessary.
23	Public Education & Outreach	Storm Drain Marking	The SWMP does not state that the City will mark new storm drain inlets resulting from new construction or redevelopment.	Include a statement that the City will mark new storm drain inlets as they are constructed.
24	Public Education & Outreach	Water Quality Hotline	The measurable goals in Section 1.3 disagree with the measurable goals in the BMP Implementation table. Section 1.3 contains a measurable goal which is not included in the BMP Implementation table.	Modify the statements in Section 1.3 and the BMP Implementation table so the measurable goals agree. Add the second measurable goal described in Section 1.3 to the BMP Implementation table.
25	Public Education & Outreach	Business Outreach	The SWMP does not contain enough detail on the City's response-to hotline calls. The "Business Outreach" paragraph includes homeowner information sheets. This is confusing.	Clarify what responses will be taken and who will take them. Delete the reference to homeowner information sheets from the "Business Outreach" paragraph.
			The SWMP states that the City will conduct site visits to distribute educational materials. However, the SWMP does not include a measurable goal for this activity.	Include a specific, numeric measurable goal for the number of site visits per year.
			The SWMP states that the City will reach 20% of businesses in the permit area. It is unclear whether the measurable goal is to reach this percentage of businesses each year or in five years.	Clarify the number (or percentage) and type of businesses the City will reach each year.

Item Number	SWMP Section	Subject	Issue	Required Revision
		It is unclear what the City means by "reaching" businesses.	Provide more detail on the implementation of this BMP. If the method for reaching the businesses is site visits, clarify which businesses the City will visit, the purpose of the visits and the information the City will provide during the visits.	
		The SWMP mentions outreach to restaurants through the City's wastewater treatment plant. It is unclear how this activity will reduce pollutants in the City's stormwater discharges.	Clarify the role this activity has in reducing pollutants in stormwater, and provide a measurable goal for the activity.	Include this sentence in the BMP implementation table as an effectiveness measure.
26	Business Outreach	Public Education & Outreach	Compiling the number of materials/brochures distributed is an effectiveness measure, not a measurable goal. The SWMP does not include a description of the topics covered by educational materials distributed to businesses.	Include a statement that the City will address the following topics, at a minimum, in educational materials targeting particular businesses: sidewalk/exterior washing, vehicle storage and maintenance, maintenance of parking areas, spill prevention and response, garbage management, loading docks, landscaping practices, illicit connections, and illicit discharges.
			The SWMP does not include a description of the topics covered by educational materials distributed to restaurants.	Include a statement that the City will address, at a minimum, and in addition to the topics relevant to businesses listed above, the following topics in educational materials distributed to restaurants: equipment washing/degreasing and disposal of grease.

Item Number	SWMP Section	Subject	Issue	Required Revision
			The SWMP does not include a description of the topics covered by educational materials distributed to automobile service businesses.	Include a statement that the City will address, at a minimum, and in addition to the topics relevant to businesses listed above, the following topics in educational materials distributed to automobile service businesses: parts cleaning/degreasing, oil/fluid storage and disposal, leak prevention and clean-up, materials and vehicle storage, and painting.
27	Public Education & Outreach	Media Campaign	Section 1.3 states that the City will publish quarterly articles or advertisements in the Buellton Banner. Table 1-1, however, states that the City will conduct one media campaign each year focused around a particular event. These measurable goals do not agree.	Clarify the measurable goal(s) for this BMP, separating measurable goals for Buellton Banner quarterly submissions from measurable goals for annual media campaigns focused around particular events. The measurable goal for media campaigns should also clarify what the City means by "campaign" (such as the number of ads run, length of time the ads are run, etc.).
28	Public Education & Outreach	Media Campaign	Compiling the number of print ads and press coverage achieved each year is an effectiveness measure, not a measurable goal.	Include this sentence in the BMP implementation table as an effectiveness measure.
29	Public Education & Outreach	Community-Based Social Marketing	The Public Education and Outreach BMPs rely heavily on information-based social marketing strategies, and incorporating them into the City's program, where appropriate, by the end of year 3.	Include a BMP to assess community-based social marketing strategies, and incorporating them into the City's program, where appropriate, by the end of year 3.

Item Number	SWMP Section	Subject	Issue	Required Revision
		through initiatives delivered at the community level which focus on removing barriers to an activity while simultaneously enhancing the activity's benefits. The Water Board has determined that permittees should assess community-based social marketing strategies, and incorporate them into the SWMP, where appropriate.	The SWMP does not include a strategy for assessing the effectiveness of Public Education and Outreach BMPs at changing public awareness and behavior regarding stormwater quality issues.	Include a BMP to develop a strategy, such as a public survey, to assess the effectiveness of the public education and outreach BMPs activities at changing behavior.
30	Public Education & Outreach	Assessing the Effectiveness of Public Education & Outreach BMPs	The BMP implementation table混淆s effectiveness measures with measurable goals and implementation details. This is confusing and makes it difficult to find the effectiveness measures.	Add a column to each BMP implementation table for effectiveness measures.
31	Tables 1-1, 2-1, 3-4, 4-1, 5-1, & 6-3	Effectiveness Measures	The measurable goal in Section 2.3 disagrees with the measurable goal in Table 2-1.	Modify the measurable goal in Table 2-1 to state that the City will present the annual report on the stormwater program to the public each year at a City Council meeting or Planning Commission meeting. In addition, add a measurable goal regarding public notice.
32	2.2.1, 2.3, & Table 2-1	Regular Public Meetings	Documenting the number of attendees at the meeting is an effectiveness measure, not a measurable goal.	Include this statement in Table 2-1 as an effectiveness measure.
33	Public Involvement/ Participation	Water Board Comments	The SWMP does not include a plan to make Water Board comments on program annual reports available to the public.	Include a BMP, or BMPs, to make Water Board comments on program annual reports available to the public.

Item Number	SWMP Section	Subject	Issue	Required Revision
34	2.2.2, 2.3, & Table 2-1	Coordination Among Agencies	This BMP does not appear to be a public involvement activity. The measurable goal in Section 2.3 disagrees with the measurable goal in Table 2-1. The SWMP does not include a specific, numeric measurable goal for the City's involvement in CASQA.	Move the description and measurable goal for this activity into a separate SWMP section, such as Program Management. Modify Table 2-1 to state that the City will attend the Intergovernmental Committee meetings each quarter. Include a specific, numeric measurable goal for the City's involvement in CASQA. Delete this statement from the SWMP. Since the Intergovernmental Committee meetings are not attended by the public, documenting the number of people attending does not provide information about the involvement of the City's citizens in the City's stormwater program.
35	2.2.3, 2.3, & Table 2-1	Community Clean-Ups	The SWMP does not include a specific, numeric measurable goal for soliciting community participation in the clean-up events. Documenting community clean-up locations and attendance are effectiveness measures, not measurable goals. The effectiveness measures in Section 2.3 disagree with the effectiveness measures in Table 2-1.	Include a specific, numeric measurable goal for soliciting community participation in the clean-up events, such as the number of groups the City will contact, the promotional methods the City will use, and/or the number of participants the City will aim to have at each event. Include these statements in Table 2-1 as effectiveness measures. Include in Table 2-1 a statement that the City will measure the amount of waste collected at each event by total weight and number of bags collected.

Item Number	SWMP Section	Subject	Issue	Required Revision
36	2.2.3, 2.3, & Table 2-1	Community Clean-Ups	The measurable goal in Section 2.3 disagrees with the measurable goal in Table 2-1.	Modify the measurable goal in Table 2-1 to state that the City will sponsor at least one clean-up event each year.
37	6.2.6	Green Waste	Section 6.2.6 mentions a green waste collection program conducted by the City. This activity is more appropriately classified as a public involvement /participation activity.	Include a BMP and measurable goal in Section 2 of the SWMP stating that the City will continue the green waste collection program. The BMP should also include, as a measurable goal, a statement that the City will evaluate the program annually to determine its effectiveness, and to modify it as necessary.
38	6.2.6	Recycling	Documenting the amount of material removed is an effectiveness measure, not a measurable goal.	Include this statement in Table 2-1 as an effectiveness measure.
38	6.2.6	Recycling	Section 6.2.6 mentions a recycling program available to the public, with collection bins located throughout the City. This activity is more appropriately classified as a public involvement /participation activity.	Include a BMP in Section 2 of the SWMP stating that the City will keep a regional recycling program available to its residents. The new BMP's measurable goal should state the number of recycling bins the City will maintain within the City.
39	6.2.6	Hazardous Materials Collection	The SWMP does not include concrete measurable goals for promoting the recycling program.	Include specific numeric goal(s) for promoting the recycling program.
39	6.2.6	Hazardous Materials Collection	Section 6.2.6 mentions a hazardous materials collection site located within the City. This activity is more appropriately classified as a public involvement/participation activity.	Include a BMP in Section 2 of the SWMP stating that the City will keep a hazardous materials collection site available to its residents.
39	6.2.6	Hazardous Materials Collection	The SWMP does not include concrete measurable goals for promoting the hazardous materials collection program.	Include specific numeric goal(s) for promoting the hazardous materials collection program.

Item Number	SWMP Section	Subject	Issue	Required Revision
40	Public Involvement/Participation	Interested Parties List	The SWMP does not include a plan to develop and maintain a list of parties within the City who are interested in the stormwater program and would like to receive information about the program. Maintaining and using an interested parties list is an excellent way for the City to notify people of upcoming issues and/or events.	Include a BMP to develop and maintain an interested parties list, and to use it to notify people of stormwater issues and upcoming events. The BMP should include specific numeric measurable goal(s) for how the interested parties list will be promoted and how members of the public can get their names on the list.
41	3.1	Authorized Non-Stormwater Discharges	The SWMP does not include an analysis of the 17 authorized non-stormwater discharges listed in General Permit section D.2.c(6) sufficient for Water Board staff to determine that they are not significant contributors of pollutants to the City's storm drain system. The SWMP states that some of the listed discharges are controlled through existing City ordinances. However, it is not clear that the municipal codes listed in Table 3-2 address all 17 authorized non-stormwater discharges. The SWMP also states that sidewalk washing, car washing, and irrigation are addressed in Section 6 of the SWMP. However, Section 6 deals with municipal activities, not homeowner or business activities. It is not sufficient for the City to address only non-stormwater discharges related to municipal activities.	Include a BMP describing a plan to evaluate all of the 17 authorized non-stormwater discharges listed in General Permit section D.2.c(6) for their potential to contribute pollutants to the storm drain system or to waterbodies. Include a measurable goal to complete this analysis in year 1. In addition, include a statement that the City will prohibit non-stormwater discharges that are found to be sources of pollution, or will require BMPs to reduce pollutants.

The SWMP states that some of the listed discharges are controlled by BMPs. If BMPs are required to control these discharges, or pollutants in these discharges, those BMPs should be fully described in the SWMP.

Include all BMPs used by the City to control any of the listed unauthorized non-stormwater discharges, including specific, numeric measurable goals and any effectiveness measures.

Item Number	SWMP Section	Subject	Issue	Required Revision
42	3.2	Controlling Illicit Discharges	The SWMP states that the City intends to maintain efforts to control illicit discharges at current levels. However, the General Permit requires the City to eliminate illicit discharges, and to effectively prohibit non-stormwater discharges (unless authorized under General Permit Section D.2.c(6)).	Modify the sentence to state that the City will develop, implement, and enforce a program to detect and eliminate illicit discharges, and to effectively prohibit non-stormwater discharges (unless authorized under General Permit section D.2.c(6)).
43	3.2.1, 3.3, & Table	Storm Drain Mapping	The measurable goals in Section 3.2.1, Section 3.3, and Table 3-4 do not agree.	<p>Modify Table 3-4 to include the following measurable goals:</p> <ul style="list-style-type: none"> • Complete the storm drain system map by the end of year 2; and • Update the storm drain system map annually to keep it current (years 3 through 5).
44	3.2.2, 3.3, & Table 3-4	Stormwater Ordinance	The SWMP states that the City will assess existing codes and ordinances. However, the SWMP is unclear on the desired outcome of this assessment and the criteria the City will use to assess existing codes and ordinances.	<p>Include explicit statements that the City will modify existing codes and ordinances, if necessary, to achieve the following minimum requirements of the General Permit:</p> <ul style="list-style-type: none"> • Develop, implement, and enforce a program to detect and eliminate illicit discharges to the City's regulated storm drain system; • Effectively prohibit, to the extent allowable by law, non-stormwater discharges into the storm drain system, including illegal dumping, and implement appropriate enforcement procedures and actions; and • Address those non-stormwater discharges listed in General Permit section D.2.c(6) where they are identified as significant contributors of pollutants. <p>In addition, state that the City will use these requirements as criteria for evaluating existing</p>

Item Number	SWMP Section	Subject	Issue	Required Revision
45	3.2.2, 3.3, & Table 3-4	Stormwater Ordinance	The measurable goals in Section 3.3 disagree with the measurable goals in Table 3-4.	codes and ordinances. Modify Section 3-3 to state that the City will assess existing ordinances by the end of year 1.
46	3.2.2, 3.3, & Table 3-4	Stormwater Ordinance	The SWMP states that the City will develop and adopt a new ordinance, if needed, by the end of year 5. This schedule will not allow the City to control illicit discharges and non-stormwater discharges during the permit period. The SWMP does not state that the City will evaluate the effectiveness of the new ordinance.	Modify the SWMP to include a statement that the City will develop and adopt the new ordinance, if needed, by the end of year 3.
47	3.2.3, 3.3, & Table 3-4	Education and Outreach	The SWMP lists avenues through which the City educates the public about illicit discharges. However, the SWMP does not state that the City will inform businesses and the general public about illicit discharges. In addition, it is unclear that the avenues listed explicitly address illicit discharges. The SWMP states that the City will equip municipal staff with an illicit discharge detection and elimination pocket guide. However, this activity is not reflected in a measurable goal. Documenting educational material handouts and attendance at training sessions are effectiveness measures, not measurable goals.	Include a statement that the City will evaluate the effectiveness of the new ordinance at eliminating illicit discharges and prohibiting non-stormwater discharges, and to modify it as necessary. Include specific, numeric measurable goal(s) to inform businesses and the general public of the hazards associated with illicit discharges and how to recognize and report illicit discharges. (An example of a measurable goal for this activity is a goal for minimum content in brochures or newspaper ads.) Include a specific, numeric measurable goal for the number and department of municipal employees who will be supplied with pocket guides. The BMP should also include a plan to measure staff's use of the guide. Include these statements in Table 3-4 as effectiveness measures.

Mr. Albrecht

Required Revision

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48	3.2.4	Mutt Mitt Program	Currently the Mutt Mitt program is combined with the Illicit Discharge Detection and Elimination Education and Outreach activity. The Mutt Mitt program is a valuable activity and should have its own BMP.	Create a separate BMP, description, measurable goal(s), and effective measure(s) for the Mutt Mitt activity. Include all content related to this activity in the BMP description and measurable goal(s).
49	3.2.4, 3.3, & Table 3-4	Spill and Complaint Response	The SWMP does not state that the City will report on responses to calls/complaints of illicit discharges.	Include a statement that the City will evaluate calls/complaints received, source(s) identified, and response to calls/complaints of illicit discharges.
50	3.2.4, 3.3, & Table 3-4	Field Investigation and Abatement	The effectiveness measures and plans to document this activity disagree between Section 3.2.4, Section 3.3, and Table 3-4.	<p>Include a statement that the City will evaluate the effectiveness of the spill complaint and response procedures.</p> <p>The effectiveness measures and plans to document this activity disagree between Section 3.2.4, Section 3.3, and Table 3-4.</p> <p>The measurable goals for this activity disagree between Section 3.2.4, Section 3.3, and Table 3-4.</p> <p>Modify Table 3-4 to include the following measurable goals:</p> <ul style="list-style-type: none"> Identify and prioritize areas of potential illicit discharge and/or illicit connections by the end of year 1 (specify the criteria the City will use to identify priority areas); Conduct regular inspections of priority potential discharge areas and known trouble spots (specify the frequency of inspections or the number of inspections each year); Walk the length of all creeks within the City's boundary each year, looking for evidence of illegal dumping and illicit discharges;

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			<ul style="list-style-type: none"> • Inspect manholes for evidence of illicit discharges (specify the number or percentage the City will inspect each year); • Use education and/or enforcement to eliminate illicit discharges (specify education/enforcement measures); • Impose BMPs, if necessary, to assure compliance; • Track discharges and maintain records of responses; • Establish on-going compliance through subsequent inspections; • Respond to septic inspection reports; and • Report on calls/complaints received, source(s) identified, or response to calls/complaints of illicit discharges. 	<p>Modify the statement in Section 3.2.4 to state that the City will conduct creek walks annually.</p>
51	3.2.4, 3.3, & Table 3-4	Field Investigation and Abatement	In Section 3.2.4, the SWMP states that the City will conduct creek walks on a monthly basis. This statement disagrees with the measurable goal in Table 3-4 to conduct creek walks annually.	<p>Modify the field investigation and abatement BMP to include evaluation of the sources listed in Table 3-3 for their illicit discharge potential. The BMP should include a plan, including numeric, specific measurable goals, and an implementation schedule, to inspect sources the City determines have potential for illicit discharge.</p>
52	Table 3-3	Identification of Illicit Discharge Sources	The SWMP does not include specific measurable goals for evaluating the sources listed in Table 3-3.	<p>Include these statements in Table 3-4 as effectiveness measures.</p>
53	3.2.4, 3.3, & Table 3-4	Field Investigation and Abatement	Documenting the number of septic to sewer conversions, the number of notices to correct, and the number of illegal connections are effectiveness measures, not measurable goals.	<p><u>California Environmental Protection Agency</u></p>

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54	3.2.4, 3.3, & Table 3-4	Field Investigation and Abatement	The SWMP does not state that the City will evaluate the effectiveness of the field inspection and abatement procedures and enforcement authorities.	Include a statement that the City will evaluate the effectiveness of the new field inspection and abatement procedures and enforcement authorities at eliminating illicit discharges and prohibiting non-stormwater discharges, and to modify them as necessary.
55	3.2.4, 3.3, & Table 3-4	County EHS Activities	The SWMP does not state that the City will modify the field inspection and abatement procedures, if necessary, following the adoption of the new stormwater ordinance. The SWMP does not include a plan for the City to obtain or use information on retail food facilities inspected and/or liquid waste discharges investigated by County EHS within the City.	Include a statement that the City will modify the field inspection and abatement procedures in year 3, if necessary, to be consistent with the new ordinance. Include a BMP describing a plan, including specific numeric measurable goal(s), and an implementation schedule for the City to track County EHS inspections and investigations within the City, to follow-up on this information through field investigation and abatement activities, to report on these activities in annual reports, and to recommend modifications to the procedures if needed.
56	3.2.4, 3.3, & Table 3-4	County Fire Department Activities	The SWMP does not include a plan for the City to obtain information from the County Fire Department on its hazardous material use and storage inspection and monitoring activities.	Include a BMP describing a plan, including specific numeric measurable goal(s), and an implementation schedule, for the City to evaluate County Fire Department hazardous material use and storage inspection and monitoring activities within the City and to recommend modifications to the procedures if needed. The new BMP should also state that the City will report on these activities in annual reports.

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57	Illicit Discharge Detection and Elimination	Training of Municipal Staff	Currently, training for municipal staff is described as part of education and outreach activities, Spill and Complaint Response activities, and Field investigation and abatement activities within the City.	<p>Create a separate BMP, description, and measurable goal(s) for the staff training. Include all content related to this activity in the BMP description and measurable goal(s). The new BMP should include the following measurable goals for years 1 through 5:</p> <ul style="list-style-type: none"> • Train all relevant staff in call/complaint receipt procedures (specify which staff will be trained and the frequency of the training); • Train all relevant staff in detecting illicit discharges and connections (specify which staff will be trained and the frequency of the training); • Train all relevant staff in spill and complaint response procedures (specify which staff will be trained and the frequency of the training); and • Train all relevant staff in field investigation and abatement procedures (specify which staff will be trained and the frequency of the training).
58	4.1, 4.2	Minimum Requirements	The SWMP lists minimum requirements for construction site runoff control derived from USEPA Fact Sheet 2.6. However, the minimum requirements listed in the SWMP do not coincide with the minimum requirements for construction site runoff control listed in the General Permit.	<p>Modify the section to include all of the following minimum requirements listed in General Permit Section D.2.d:</p> <ul style="list-style-type: none"> • An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions, or other effective mechanisms, to ensure compliance; • Requirements for construction site operators to implement appropriate erosion and sediment control BMPs; • Requirements for construction site

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59	4.1	Minimum Requirements	The SWMP states that the City is required to establish construction site runoff controls for sites of one or more acres. However, the General Permit also requires that construction activities disturbing less than one acre must be included in your program if that activity is part of a larger common plan of development or sale that would disturb one acre or more.	<ul style="list-style-type: none"> operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site; Procedures for site plan review which incorporate consideration of potential water quality impacts; Procedures for receipt and consideration of information submitted by the public; and Procedures for site inspection and enforcement of control measures.
60	4.2.5, Table 4-1	Construction Stormwater Ordinance	The SWMP states that the City will review its existing Excavation and Grading Code and make revisions by the end of year 2, and that the City will adopt a revised code by the end of year 5. This schedule will not allow the City to control construction site runoff to the MEP during the permit period.	Modify the SWMP to state that the City will complete review of the existing code and recommend revisions by the end of year 1, and adopt the new code by the end of year 3. Also include a statement that the City will submit the draft code to Water Board staff to review for compliance with the conditions of the General Permit.
61	4.2.5, Table 4-1	Construction Stormwater Ordinance	The measurable goal in Section 4.2.5 does not agree with the measurable goal in Table 4-1.	Modify section 4.2.5 and Table 4-1 to state that the City will complete review of the existing code and recommend revisions by the end of year 1, and adopt the new code by the end of year 3.

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62	4.2	SWPPP Requirement	The SWMP suggests that the City will require approval of construction site SWPPPs prior to construction. However, this activity is not included as a measurable goal.	Include, as a measurable goal in Table 4-1, a statement that the City will require submission of SWPPPs from all construction projects, and approve them, prior to start of construction (years 1 through 5).
63	4.2.1, 4.2.5, & Table 4-1	Construction Site Inspections	The SWMP mentions daily inspections for active projects and monthly inspections throughout project duration. It is unclear what the City means by "active projects" and "project duration." The SWMP does not mention inspection frequency for sites less than one acre.	<p>Include a precise and enforceable definition of these terms.</p> <p>Include a specific, numeric measurable goal for inspection frequency at the following sites:</p> <ul style="list-style-type: none"> • Sites less than one acre; and • Sites less than one acre which are part of a larger plan of development or sale.
64	4.2.1, 4.2.5, & Table 4-1	Inspection Procedures	The measurable goals in Section 4.2.5 do not agree with the measurable goals in Table 4-1. Documenting project site inspections is an effectiveness measure, not a measurable goal.	<p>Include all measurable goals in Table 4-1.</p> <p>Include this statement in Table 4-1 as an effectiveness measure.</p> <p>Include a BMP to develop construction site inspection procedures. The BMP should state that the procedures will incorporate the following elements:</p> <ul style="list-style-type: none"> • The objectives the construction site inspection and enforcement procedures will be designed to achieve, consistent with General Permit requirements and Water Board expectations; • Implementation goals and applicability criteria consistent with General Permit

Item Number	SWMP Section	Subject	Issue	Required Revision
				<p>requirements and Water Board expectations;</p> <ul style="list-style-type: none"> • Measurable goals and effectiveness measures related to inspection timing and frequency, to ensure that inspection procedures and enforcement achieve desired results; • A clear schedule for when the procedures will be completed, adopted, and implemented; • A statement that the City will implement the procedures; • Measurable goals and effectiveness assessment measures related to the implementation of current construction site inspection and enforcement procedures; and • A statement that the City will evaluate the effectiveness of the new inspection and enforcement procedures and to revise them, if necessary.
65	Construction Site Runoff Control	Inspection Checklist	The SWMP does not state that the City will develop and use a construction site inspection checklist. Checklists ensure that sites receive comprehensive and effective inspections.	<p>Include a BMP to develop and use a construction site inspection checklist. The BMP should state that the City will evaluate the effectiveness of the checklist and revise it, if necessary.</p>
66	Construction Site Runoff Control	Construction Site Tracking	The SWMP does not state that the City will develop and use a system to track construction site compliance with the General Permit. Such a tracking system enables the City to identify problem areas and repeat offenders, and to apply escalating enforcement effectively.	<p>Include a BMP to develop and use a construction site tracking system. The BMP should state that the City will evaluate the effectiveness of the system and revise it, if necessary.</p>

Item Number	SWMP Section	Subject	Issue	Required Revision
67	4.2.1, 4.2.5, & Table 4-1	Construction Site Enforcement	The SWMP states that the City will take enforcement action at sites where BMPs have failed. The City must also implement enforcement where BMPs have not been implemented or have been implemented improperly.	<p>Include a statement that the City will initiate enforcement action at 100% of sites where BMPs have not been implemented properly or adequately.</p> <p>Modify Table 4-1 to state that the City will implement enforcement action at 100% of sites where BMPs have failed or have been implemented improperly or inadequately.</p> <p>Include this statement in Table 4-1 as an effectiveness measure.</p>
68	4.2.2	Conditions of Approval	<p>The measurable goal in Section 4.2.5 does not agree with the measurable goal in Table 4-1.</p> <p>Documenting project site enforcement actions is an effectiveness measure, not a measurable goal.</p> <p>The SWMP does not specify existing conditions of approval. Water Board staff is unable to determine whether the conditions of approval comply with the General Permit and meet the MEP standard.</p> <p>The SWMP does not specify conditions of approval the City will adopt and apply to construction sites. Without this detail, Water Board staff is unable to determine whether the new conditions of approval will comply with the General Permit and meet the MEP standard.</p>	<p>Include a detailed list of the City's existing conditions of approval related to stormwater. Include also specific, numeric measurable goal(s) for the implementation and enforcement of the existing conditions of approval.</p> <p>Include a list of the conditions of approval City will develop in order to achieve compliance with the General Permit and meet the MEP standard. The BMP should include specific, numeric measurable goals, applicability criteria, and a statement that the City will develop, adopt, and implement the conditions of approval by the end of year 3. At a minimum, the list should include the following:</p> <ul style="list-style-type: none"> • A requirement that all sites larger than 1 acre, or which are part of a larger plan of development or sale which disturbs more

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				<p>than 1 acre, implement BMPs in compliance with General Permit Sections D.2.d(2) and (3);</p> <ul style="list-style-type: none"> • A requirement that sites regulated by the State Construction Stormwater General Permit show proof of having submitted a NOI to the State Water Board prior to grading permit approval; • A requirement that all sites submit a construction site plan indicating the location all BMPs; and • A requirement that all sites larger than 5 acres submit a grading/erosion control plan.
69	BMP Standards	Construction Site Runoff Control	The SWMP does not state that the City will adopt BMP selection, implementation, and performance standards. BMP standards are the basis for construction site plan review, inspection, and enforcement.	<p>Include a BMP to develop, adopt, implement, and enforce standards for construction site BMP selection, implementation, and performance. The BMP should include specific, numeric measurable goals, and a statement that the City will develop the standards by the end of year 3.</p>
70	Construction Site Runoff Control	Construction Site Plan and Grading/Erosion Control Plan Review	The SWMP does not include procedures for reviewing construction site plans or grading/erosion control plans. The City is required to develop, implement and enforce procedures for construction site plan review which incorporate consideration of potential water quality impacts.	<p>Include a BMP to develop procedures for reviewing site plans and grading/erosion control plans. The BMP should include the following elements:</p> <ul style="list-style-type: none"> • The objectives the plan review process will be designed to achieve, consistent with General Permit requirements and meet the MEP standard; • A statement that the City will develop authority for site plan review consistent with General Permit requirements and meet the MEP standard; • Quantifiable goals to ensure that site plan

Item Number	SWMP Section	Subject	Issue	Required Revision
			procedures achieve desired results;	<ul style="list-style-type: none"> • A clear schedule for when the new review procedures will be completed, adopted, and implemented; and • A statement that the City will evaluate the effectiveness of the new plan review process and to revise it, if necessary.
71	4.2.3, 4.2.5, & Table 4-1	Training for Plan Reviewers	The SWMP combines training for plan reviewers with the Conditions of Approval BMP. This is confusing and makes it difficult to track implementation and effectiveness of the training:	Create a separate BMP, description, and specific numeric measurable goals for training construction plan reviewers in the site plan and grading/erosion control plan procedures.
72	4.2.3, 4.2.5, & Table 4-1	Training for Inspectors	The SWMP does not include a specific, numeric measurable goal for this activity.	Include a measurable goal to train 100% of construction site inspectors annually in current inspection, documentation, and tracking procedures.
73	Construction Site Runoff Control	Procedures for Receipt and Consideration of Information Submitted by the Public	While the SWMP mentions receiving comments on construction site BMP requirements at annual public workshops, the SWMP does not include specific measures for receiving and considering information submitted by the public on construction site BMP performance. The City is required by the General Permit to develop and implement such procedures.	<ul style="list-style-type: none"> Include a BMP to receive and consider information submitted by the public. The BMP should include the following elements: <ul style="list-style-type: none"> • Procedures for documenting and responding to information from the public regarding potential State and City permit violations on construction sites; • Measures to educate the public on how to recognize and report potential permit violations on construction sites; • A statement that the City will evaluate the effectiveness of the procedures and measures, and to modify them if

Item Number	SWMP Section	Subject	Issue	Required Revision
74	4.2.4, 4.2.5, & Table 4-1	Construction Workshops	The SWMP states that the City will partner with the County in providing free or low cost workshops for the construction community to explain regulations and demonstrate appropriate BMPs. However, the SWMP does not include this statement as a measurable goal.	<p>Include this topic in the training provided to staff who will receive and respond to the information.</p> <p>Include a specific numeric measurable goal for construction community workshops, such as offering one workshop per year prior to the beginning of the construction season. Include also specific numeric measurable goals for promoting the workshops.</p>
75	4.2.4, 4.2.5, & Table 4-1	Construction Workshops	The SWMP mentions construction workshops in Section 4.2.4, but not in Section 4.2.5 or Table 4-1.	<p>Include construction workshops in Table 4-1.</p>
76	4.2.3, 4.2.5, & Table 4-1	Certified Inspector	The SWMP states that the City will have at least one staff member certified as a Caltrans-certified inspector by the end of year 1. However, this activity is not included as a measurable goal.	<p>Include in Table 4-1 a measurable goal to have at least one Caltrans-certified stormwater inspector on staff by the end of year 1 and throughout the life of the permit.</p>
77	Post-Construction	Minimum Requirements	The SWMP lists minimum requirements for post-construction runoff control derived from USEPA Fact Sheet 2.7. However, the minimum requirements listed in the SWMP do not coincide with the minimum requirements for construction site runoff control listed in the General Permit.	<p>Modify the section to clarify that the City will develop, implement, and enforce a program to address storm water runoff from new development and redevelopment projects that disturb acre or more, including projects smaller than one acre that are part of a larger common plan of development or sale.</p>
78	5.1	Supplemental Provisions (Attachment 4)	The SWMP states that the City will review the efficacy of regulations intended to address the issues discussed in Attachment 4 to the General Permit. However, this statement is not reflected in a measurable goal. In order to ensure municipalities achieve the current MEP standard, the Water Board requires all municipalities to comply with Attachment 4	<p>Include a specific numeric measurable goal, including an implementation schedule, to incorporate Attachment 4 requirements into the City's development policies, standards, and review processes.</p>

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79	5.2.1, 5.3, & Table 5-1	CEQA Initial Study Checklist	requirements. The SWMP states that the City will review its CEQA checklist to determine its effectiveness, and recommend modifications by the end of year 2. It is unclear what standard of effectiveness the City will use to review the CEQA checklist, or what criteria the City will use to assess the checklist's effectiveness.	Include a statement that the City will modify the CEQA checklist to incorporate all relevant elements of the City's hydromodification and runoff water quality control policies and standards as they are developed and/or adopted. Reflect this statement in the BMP's measurable goals.
80	5.2.1, 5.3, & Table 5-1	Conceptual Review	The SWMP states that the City will evaluate its conceptual review process to determine whether water quality issues are adequately addressed. It is unclear what water quality issues the City intends to address through its conceptual review process.	Include a statement that the City will modify the conceptual review process to incorporate all relevant elements of the City's hydromodification and runoff water quality control policies, standards, and conditions of approval as they are developed and/or adopted.
81	Post-Construction	Long-Term Watershed Protection	The City's intent to evaluate the conceptual review process is not reflected in the measurable goals or in Table 5-1.	<p>Include a BMP to develop the conceptual review process in Table 5-1.</p> <p>While the SWMP discusses reviewing and revising water quality protection policies, the CEQA checklist, and standard conditions of approval/mitigation measures and engineering permit conditions, it does not state the City's plans for long-term watershed protection. The SWMP must state that the City will develop long-term watershed protection in order to meet the MEP standard.</p> <ul style="list-style-type: none"> • Characterize the MS4's watersheds and sub-watersheds, including an analysis of current water quality conditions, stream health, land use and development patterns, and pollution/degradation trends; • Evaluate existing watershed protection efforts, including land use policies, plans, ordinances, guidance manuals, development project review procedures,

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82	Post-Construction	Long-Term Watershed Protection	The SWMP does not specify the desired watershed conditions the City will achieve through its long-term watershed protection measures.	<ul style="list-style-type: none"> • Integrate stormwater management measures and water quality objectives into all aspects of land use planning and development; • Develop quantifiable measures that indicate how the City's watershed protection efforts achieve desired watershed conditions; and • Evaluate the effectiveness of the efforts, and adapt or change them if warranted.
83	Post-Construction	Riparian Area Protection	The SWMP does not state that the City will provide protective buffers for waterbodies and wetlands.	<ul style="list-style-type: none"> • Watershed storage of runoff at pre-development levels; • Watercourse geomorphic regimes within natural ranges; • Optimal riparian and aquatic habitats; and • Pollutant reduction to the MEP.

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84	5.2.1	Water Quality Protection Policies	While the SWMP discusses reviewing and revising water quality protection policies, it does not provide a description of current policies, codes, plans, and ordinances the City will review and revise.	larger buffers where possible and appropriate. Include a description of current development policies, codes, plans, and ordinances which address development in the City.
85	5.2.1, 5.3, & Table 5-1	Water Quality Protection Policies	The SWMP does not state that the City will apply and enforce existing policies, codes, plans, and ordinances to manage post-construction stormwater runoff.	Include a statement that the City will apply and enforce existing policies, codes, plans, and ordinances to manage post-construction stormwater runoff.
86	5.2.1	Water Quality Protection Policies	The SWMP does not include criteria the City will use to evaluate the effectiveness of existing development policies, codes, plans, and ordinances at achieving General Permit conditions and meet the MEP standard for post-constructions stormwater management.	Include a statement that the City will evaluate its existing development policies, codes, plans, and ordinances on the basis of their compliance with General Permit conditions and the MEP standard, and their effectiveness at achieving the desired watershed conditions.
87	5.2.1, 5.3, & Table 5-1	Water Quality Protection Policies	The SWMP does not state that the City will adopt, apply, and enforce revised policies, codes, plans, and ordinances to manage post-construction stormwater runoff.	Include a statement that the City will adopt, apply, and enforce revised policies, codes, plans, and ordinances to manage post-construction stormwater runoff by the end of year 5.
88	5.3 Table 5-1	Water Quality Protection Policies	The SWMP states that the City will adopt and implement revised water quality protection policies in years 3 through 5. Interim hydromodification criteria must be implemented and applied to new development and redevelopment projects starting one year after adoption of the SWMP.	Clarify that the City will adopt, implement and apply revised water quality protection policies related to interim hydromodification control criteria to new development and redevelopment projects starting one year after adoption of the SWMP.
89	5.2.1	Conditions of Approval	While the SWMP discusses evaluating the City's standard conditions of approval/mitigation measures and engineering permit conditions, it does not describe the current conditions and measures in place in the City.	Include a description of current conditions of approval the City applies to development projects. The description should include the criteria the City uses to determine the applicability of the conditions to particular projects, and the enforcement authorities

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90	5.3 Table 5-1	Conditions of Approval	The SWMP does not include a state that the City will apply and enforce current conditions of approval/mitigation measures and engineering permit conditions.	currently in place in the City to require compliance. Include a statement that the City will apply and enforce current conditions of approval/ mitigation measures, including specific numeric measurable goal(s) for this activity.
91	5.2.1, 5.3, & Table 5-1	Conditions of Approval	The SWMP does not specify the desired outcome of the City's evaluation and modification of its conditions of approval/mitigation measures and engineering permit conditions.	Express, in the form of specific numeric measurable goals, a list of desired outcomes the City intends to incorporate into its conditions of approval. The list should include at least the following elements: <ul style="list-style-type: none"> • Maximize application of LID land use and site planning principles; • Maximize application of LID stormwater controls; and • Maximize preservation of natural topography, vegetation, drainage patterns, and stream location.
92	5.3 Table 5-1	Conditions of Approval	The SWMP does not state that the City will modify current conditions of approval/mitigation measures and engineering permit conditions to increase their effectiveness at achieving desired outcomes and desired watershed conditions.	Include a statement that the City will modify current conditions of approval/mitigation measures and engineering permit conditions to increase their effectiveness at achieving desired outcomes and desired watershed conditions.
93	5.3 Table 5-1	Conditions of Approval	The SWMP does not state that the City will adopt, apply, and enforce revised conditions of approval/ mitigation measures and engineering permit conditions.	Include a statement that the City will adopt, implement and apply revised conditions of approval/mitigation measures and engineering permit conditions by the end of year 5.
94	5.3 Table 5-1	Conditions of Approval	The SWMP states that the City will adopt and implement revised conditions of approval/mitigation measures and engineering permit conditions in years 3 through 5. Interim hydromodification criteria	Clarify that the City will adopt, implement and apply revised conditions of approval/mitigation measures and engineering permit conditions, as related to interim hydromodification control criteria, to new development and

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			must be implemented and applied to new development and redevelopment projects starting one year after adoption of the SWMP.	redevelopment projects starting one year after adoption of the SWMP.
95	Post-Construction	LID	The SWMP states that post-construction stormwater control measures may include LID concepts and controls. The Water Board has determined that municipalities must maximize the use of LID in new development and redevelopment projects in order to meet the MEP standard.	<ul style="list-style-type: none"> Include a BMP describing a strategy to maximize the use of LID land use planning principles, site design principles, and stormwater controls in new development and redevelopment connected to the City's MS4. The BMP should include at least the following elements: <ul style="list-style-type: none"> • Specific numeric measurable goals for the use of LID, including criteria for the selection and performance of controls; • An implementation plan that includes a list of the policies, codes, ordinances, and standards that will need to be revised; • An implementation schedule; and • A statement that the City will evaluate the effectiveness of the City's LID policy and modify it, if necessary;
96	Post-Construction	Hydromodification Management Plan	While the SWMP discusses reviewing and revising existing development policies and standards, it does not state that the City will develop a comprehensive hydromodification control plan consistent with General Permit conditions and the MEP standard.	<ul style="list-style-type: none"> Include a BMP describing how and when the City will develop long-term hydromodification criteria and control measures as part of a Hydromodification Management Plan that will be based on a technical assessment of the impacts of development on the City's watersheds. An adequate technical assessment will address the following: <ul style="list-style-type: none"> • Hydrograph modification (flow volume, duration, and rate); • A wide range of flow events and continuous flow modeling; • Effects of imperviousness; • Evaluation of downstream affects (stream

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			<p>The assessment should result in:</p> <ul style="list-style-type: none"> • Riparian and wetland buffer zone requirements; and • Water quality impacts. 	<p>The assessment should result in:</p> <ul style="list-style-type: none"> • Numeric criteria for runoff rate, duration, and volume control for development and redevelopment projects; • Numeric criteria for stream stability impacts for development and redevelopment projects; • Identification of areas within the City where these criteria must be met; • Specific performance and monitoring criteria for installed hydromodification control infrastructure; • Riparian buffer zone requirements; and • Appropriate hydromodification control measures such as LID concepts, on-site hydrologic and water quality controls, and in-stream controls. <p>Identify the key steps in the process that the City will use to develop the Hydromodification Management Plan. Examples of steps that the City should consider include:</p> <ul style="list-style-type: none"> • Development of problem statement and objectives; • Review of literature and data availability; • Characterization of watershed and future development patterns; • Determination of assessment methodology;

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97	Post-Construction	Application of Hydromodification Control Criteria	The SWMP does not specify a method the City will use to determine which projects in the development application pipeline will have to comply with the City's hydromodification control criteria once the City adopts such criteria.	<ul style="list-style-type: none"> • Development of criteria and guidance; and • Development of an implementation strategy. <p>Specify the method the City will use to determine which projects in the development application pipeline will have to comply with the City's hydromodification control criteria once the City adopts such criteria. The method could be an application cut-off date relative to the date of adoption of the hydromodification control criteria.</p>
98	Post-Construction	Interim Hydromodification Control Criteria	The SWMP does not include the schedule the City will follow to develop the alternative interim hydromodification criteria. The SWMP also does not identify the goals and expected effectiveness of the alternative interim hydromodification criteria.	<p><u>Option 1</u></p> <p>The proposed criteria may include the following types of requirements which provide a high degree of assurance of effective hydromodification control without regard to the nuances of individual watersheds:</p> <ul style="list-style-type: none"> • For new and re-development projects, Effective Impervious Area¹ shall be maintained at less than five percent (5%) of total project area. • For new and redevelopment projects that create and/or replace 5,000 square feet or more of impervious surface, the post-construction runoff hydrographs shall

¹ Effective Impervious Area is that portion of the impervious area that drains directly to a receiving surface waterbody via a hardened storm drain conveyance without first draining to a pervious area. In other words, impervious surfaces tributary to pervious areas are not considered Effective Impervious Area.

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				<p>match within one percent (1%) the pre-development² runoff hydrographs, for a range of events with return periods from 1-year to 10-years.</p> <ul style="list-style-type: none"> For projects whose disturbed area exceeds two acres, preserve the pre-development drainage density (miles of stream length per square mile of watershed) for all drainage areas serving a first-order stream³ or larger, and ensure that post-project time of concentration is equal or greater than pre-project time of concentration. <p>OR</p> <p><u>Option 2</u> The City may use the following process to develop interim criteria as effective as the above criteria. "As effective as" means the City may use other approaches (including other variables or numeric criteria, different than Option 1 criteria, appropriate for the City's watersheds) to control hydromodification and protect the biological and physical integrity of the City's watersheds. Other acceptable approaches to develop interim criteria that are as effective as Option 1 include:</p> <p>A. Adopt and implement hydromodification</p>

² The pre-development condition is defined as the native vegetation and soil conditions that exist prior to human influence (e.g., grazing, agriculture, timber harvesting, or urbanization).

³ A first-order stream is defined as a stream with no tributaries.

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			<p>criteria developed by another municipality and approved by Board staff, such as the criteria the Water Board adopted for the City of Salinas, as interim criteria;</p> <p>OR use the following methodology to develop interim criteria:</p> <p>B. Include a BMP to develop interim hydromodification criteria, including a period of no less than three (3) weeks to allow for Water Board staff's review of the proposed criteria. The BMP shall state:</p> <p>"The City will develop interim flow control and infiltration criteria. These interim criteria shall be developed and adopted within one year of the City's enrollment. For the interim criteria, the City shall:</p> <ul style="list-style-type: none"> • Identify a range of runoff flow rates for which post-project runoff flow rates and durations shall not exceed pre-project runoff rates and durations, where the increased discharge rates and durations will result in off-site erosion or other significant adverse impacts to beneficial uses. Pre-project refers to the condition immediately prior to the proposed project. The condition includes, but is not limited to, soil type, vegetation, and amount of impervious surface. • Establish numeric criteria for development projects to maximize infiltration on-site 	

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			and approximate natural infiltration levels to the maximum extent practicable and to effectively implement applicable LID strategies.	<ul style="list-style-type: none"> Identify the projects, including project type, size and location, to which the City will apply the interim criteria. The projects to which the City will apply the interim criteria must include all those projects that will cause off-site erosion or other significant adverse impacts to beneficial uses. Identify methods to be used by project proponents to demonstrate compliance with the interim discharge rate and duration criteria, potentially including continuous simulation of the entire rainfall record. Identify methods to be used by project proponents to demonstrate compliance with the interim infiltration criteria, including analysis of site imperviousness."
99	Post-Construction	Plan Review	The SWMP does not state that the City will review post-construction stormwater management measures of new development and redevelopment projects for compliance with the City's existing post-construction stormwater management requirements.	Add a BMP to review post-construction stormwater management measures of new development and redevelopment projects for compliance with the City's existing post-construction stormwater management requirements. The BMP should include specific numeric measurable goal(s) for plan review.
100	Post-Construction	Plan Review Procedures	The SWMP does not include a description of the City's current procedures for reviewing post-construction stormwater management measures proposed by new development and redevelopment.	Include a description of the procedures the City currently uses to review post-construction stormwater management measures for new and redevelopment.

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101	Post-Construction	Plan Review Procedures	<p>The SWMP does not state that the City will evaluate the effectiveness of the City's existing post-construction stormwater plan review procedures, and to modify them as necessary to be consistent with the City's post-construction stormwater management requirements.</p> <ul style="list-style-type: none"> • A statement that the City will evaluate the effectiveness of the City's existing procedures at achieving compliance with the City's existing post-construction stormwater requirements; • A statement that the City will modify the existing procedures, as necessary, to be consistent with the City's evolving post-construction stormwater requirements; • A statement that the City will modify the procedures to achieve compliance with the City's post-construction stormwater requirements as those requirements are modified in accordance with the implementation schedule indicated in the SWMP, including procedures to implement the City's interim hydromodification control criteria by the end of year 1. • A statement that the City will continuously evaluate the effectiveness of the City's plan review procedures to ensure management of post-construction stormwater from new development and redevelopment to the MEP. 	<p>Include a statement that the City will evaluate the effectiveness of the City's existing post-construction stormwater plan review procedures and to modify them as necessary. The BMP should include the following elements:</p> <ul style="list-style-type: none"> • A statement that the City will evaluate the effectiveness of the City's existing procedures at achieving compliance with the City's existing post-construction stormwater requirements; • A statement that the City will modify the existing procedures, as necessary, to be consistent with the City's evolving post-construction stormwater requirements; • A statement that the City will modify the procedures to achieve compliance with the City's post-construction stormwater requirements as those requirements are modified in accordance with the implementation schedule indicated in the SWMP, including procedures to implement the City's interim hydromodification control criteria by the end of year 1. • A statement that the City will continuously evaluate the effectiveness of the City's plan review procedures to ensure management of post-construction stormwater from new development and redevelopment to the MEP. <p>Include a BMP to develop, and continuously evaluate and modify as needed, a checklist for reviewing post-construction stormwater controls for new development and redevelopment.</p>
102	Post-Construction	Plan Review Procedures	<p>The SWMP does not state that the City will develop a plan review checklist for reviewing post-construction stormwater controls. Checklists ensure that development plans</p>	<p><i>California Environmental Protection Agency</i></p>

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103	Post-Construction	Enforcement Authority	The SWMP does not state that the City will develop sufficient enforcement authorities to achieve compliance with General Permit requirements and Water Board expectations for post-construction stormwater control from new development and redevelopment.	Include a statement that the City will develop, adopt, and implement the necessary authorities, including specific numeric measurable goal(s) and an implementation schedule consistent with the City's schedule for developing its post-construction stormwater controls. State also that the City will continuously evaluate the effectiveness of the City's enforcement authorities, and revise them as necessary.
104	Post-Construction	Inspection Procedures	The SWMP does not state that the City will inspect post-construction stormwater measures prior to project completion.	Include a BMP to inspect post-construction stormwater measures prior to project completion for new development and redevelopment projects. The BMP should include numeric specific measurable goal(s) for site inspection (e.g., no final approval for projects until post-construction stormwater controls are inspected, tested, and found to function as designed).
105	Post-Construction	Inspection Procedures	The SWMP does not describe the City's current procedures for inspecting post-construction stormwater measures prior to the completion of construction.	Include a description of the City's current inspection procedures for post-construction stormwater measures.
106	Post-Construction	Inspection Procedures	The SWMP does not state that the City will evaluate the City's inspection procedures for post-construction stormwater measures for effectiveness and consistency with the City's evolving requirements, and to modify the procedures as necessary.	Include a BMP to evaluate the effectiveness of the City's inspection procedures for post-construction stormwater measures at achieving desired conditions and General Permit conditions. Include specific numeric measurable goal(s) and an implementation schedule for this BMP consistent with the City's schedule to revise its requirements for post-construction stormwater measures for new development and redevelopment.

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107	Post-Construction	Inspection Checklist	The SWMP does not state that the City will develop a checklist for inspecting post-construction stormwater measures for new development and redevelopment, including specific numeric measurable goal(s) for development of the checklist and measures to evaluate the checklist's effectiveness at achieving desired outcomes.	Include a statement that the City will develop a checklist for inspecting post-construction stormwater measures for new development and redevelopment, including specific numeric measurable goal(s) for development of the checklist and measures to evaluate the checklist's effectiveness at achieving desired outcomes.
108	Post-Construction	BMP Tracking System	The SWMP does not state that the City will develop a system to track stormwater control BMPs during and after construction.	Include a BMP to develop a system to track post-construction stormwater measures for new development and redevelopment. The system should track each post-construction stormwater management BMP and its inspection and approval prior to final project approval; as well as its inspection, maintenance, and performance while in use.
109	5.2.3, 5.3, & Table 5-1	Monitor Discretionary Projects	While the SWMP mentions monitoring discretionary projects, it does not include a plan to ensure long-term performance of post-construction stormwater management BMPs. The SWMP is not clear about what will be monitored or the criteria the City will use to determine compliance. In addition, the measurable goals in Section 5.2.3, Section 5.3, and Table 5-1 do not agree.	<p>Modify the BMP to include at least the following elements:</p> <ul style="list-style-type: none"> • A statement that the City will require every post-construction stormwater management BMP to be in long-term compliance with the City's post-construction stormwater management requirements; • The identity of the party (e.g., City, homeowners association, etc.) that will be responsible for ensuring long-term function of BMPs; • A statement that the City will develop a maintenance agreement, prior to the end of year 1, that clarifies responsibility for long-term maintenance of BMPs, and enforcement authority and procedures sufficient to ensure long-term maintenance of BMPs;

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				<ul style="list-style-type: none"> • Expectations for BMP performance; • Expectations for inspection and maintenance frequency; • A statement that the City will implement and enforce the strategy; and • A statement that the City will evaluate the effectiveness of the long-term maintenance strategy and to modify it as necessary.
110	5.2.2, 5.3, & Table 5-1	Training for Plan Review Staff	The SWMP states that planning staff and supporting consultants will be trained to recognize potential water quality impacts and to condition projects accordingly. However, this BMP does not contain enough detail for Water Board staff to determine compliance with General Permit conditions and the MEP standard. In addition, the measurable goals in Section 5.2.2, Section 5.3, and Table 5-1 do not agree.	<p>Modify the BMP to include at least the following elements:</p> <ul style="list-style-type: none"> • A statement that the City will provide annual training for all staff and consultants who review project plans for new development and redevelopment; • A statement that the training will cover all topics necessary for the plan review process to achieve compliance with City post-construction stormwater management requirements for all new development and post development projects, including skills necessary for evaluating the adequacy of proposed post-construction stormwater measures; • A statement that the City will require structural and non-structural BMPs, not just encourage and recommend them, to ensure that projects comply with City post-construction stormwater management requirements; and • A statement that the City will evaluate the effectiveness of the training and to modify it as necessary.

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111	5.2.2, 5.3, & Table 5-1	Training for Plan Review Staff	The SWMP states that 100% of Planning staff will encourage and recommend design of projects to incorporate structural and non-structural BMPs. Plan review staff must require structural and non-structural BMPs as a condition of approval.	Revise Section 5.3 to reflect the City's plan to require structural and non-structural BMPs as a condition of approval for new development and redevelopment.
112	Post-Construction	Training for Inspectors	The SWMP does not include a plan to train construction site inspectors to inspect post-construction stormwater control measures.	<ul style="list-style-type: none"> Include a BMP to train inspectors to inspect post-construction stormwater control measures. The BMP should include at least the following elements: <ul style="list-style-type: none"> A statement that the City will provide annual training for all inspectors; A statement that the training will cover all topics necessary for new development and redevelopment projects to achieve compliance with the City's evolving post-construction stormwater management requirements; and A statement that the City will evaluate the effectiveness of the training and to modify it as necessary.
113	6.0	Intent of the Minimum Control Measure	The SWMP states that the intent of Pollution Prevention/Good Housekeeping for Municipal Operations activities is to protect stormwater quality. This is only partially true. The City should be aware that pollutants can be discharged to waterbodies directly without being transported by stormwater runoff.	Modify the SWMP to state that the intent of Pollution Prevention/Good Housekeeping for Municipal Operations activities is to reduce pollutants in stormwater to the MEP and protect water quality.
114	Table 6-1	Potential Pollution Sources	The SWMP does not include litter as a potential pollutant source at several facilities listed in Table 6-1.	Include litter in Table 6-1 as a potential pollutant source at City Hall, the City Office/Library Annex, and Oak Valley Park.
115	Table 6-1, Table 6-2	Potential Pollution Sources	The SWMP does not include hazardous materials or hazardous materials spills as a potential pollutant source in Table 6-1 or	Include hazardous materials and hazardous materials spills in Table 6-1 and Table 6-2 as potential sources of pollution.

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116	Table 6-1	Potential Pollution Sources	Table 6-2. The SWMP mentions the Library Annex, but does not mention a library.	If there is a City-owned library building in the City, include the facility in Table 6-1.
117	Table 6-2	Potential Pollution Sources	Table 6-2 does not mention waterline flushing.	Include waterline flushing, if applicable, in Table 6-2.
118	Table 6-2	Potential Pollution Sources	The SWMP does not include chlorine or other disinfection chemicals as a potential pollutant source from several activities listed in Table 6-2.	Include chlorine/disinfection chemicals in Table 6-2 as a potential pollutant from water pressure testing, waterline flushing, and fire hose testing, if applicable.
119	6.2.1, 6.3, & Table 6-3	City-wide BMPs	The SWMP suggests that the City is already implementing BMPs for some municipal operations, but doesn't describe them.	Include a description of all BMPs currently implemented by the City to control the discharge of pollutants to stormwater or surface water from municipal operations, including any specific numeric performance expectations or effectiveness measures. Include also a statement that the City will implement all existing BMPs beginning in year 1.
120	6.2.1, 6.3, & Table 6-3	City-wide BMPs	The SWMP states that the City will develop a menu of suggested BMPs for municipal operations. The City must identify required BMPs for each municipal operation with the potential to discharge pollutants to stormwater or surface water.	Include a statement that the City will identify, by the end of year 1, BMPs the City will implement for all other municipal operations. State that these BMPs will be implemented by the end of year 2.
			The measurable goals in Section 6.2.1, 6.3, and Table 6-3 do not agree.	Modify Table 6-3 to include all of the measurable goals for this BMP.
			In addition, the table does not state that the City will perform ongoing evaluation of the appropriateness and effectiveness of City-wide BMPs.	In addition, include a statement that the City will perform ongoing evaluation of the appropriateness and effectiveness of BMPs starting in year 3, and to revise or replace BMPs as necessary.

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			Tabulating the number of BMPs implemented is an effectiveness measure, not a measurable goal.	Include this statement in Table 6-3 as an effectiveness measure.
121	6.2.2, 6.3, & Table 6-3	Purchasing and Contracts	The SWMP states that the City will review contractual language and determine whether to include a requirement to employ the City's BMPs. The City must require contractors and vendors to comply with General Permit requirements to reduce pollutants to the MEP and protect water quality.	Modify the BMP to include a statement that the City will revise contractual language, as necessary, to require vendors and contractors to implement BMPs that are City-approved and in compliance with General Permit conditions, including a plan for inspecting work done by contractors and vendors for compliance with City and General Permit requirements. State also that the City will complete this activity by the end of year 2.
122	Table 6-3	Effectiveness Measures	The SWMP states that violation of a project's water quality plan by a contractor would be grounds for termination of the contract. However, the SWMP does not state that the City will correct or mitigate water quality impacts resulting from the violation.	<p>The following are effectiveness measures, not measurable goals:</p> <ul style="list-style-type: none"> • Count the number of contracted projects or activities which affect water quality; • Evaluate contractor compliance with BMPs; • Count the number of violation notices sent and corrective actions taken. • Count the number of training sessions presented each year;

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123	6.2.3, 6.3, & Table 6-3	Staff Training	<p>The SWMP does not state that the City will train staff in year 1 in the proper implementation of BMPs already in place for municipal operations.</p> <p>The SWMP does not state that the City will identify the staff who will be trained in the proper implementation of BMPs. Without this information, the City will not be able to confirm that all relevant staff received appropriate training.</p> <p>Documenting the number of staff attending training events does not measure the effectiveness of the City's training efforts.</p>	<ul style="list-style-type: none"> Count the staff attending each training session; and Count the email and/or mass-distributed fact sheets distributed. <p>Include a statement that the City will provide annual training for all relevant staff, beginning in year 1, in the proper implementation of all BMPs adopted by the City for municipal operations.</p> <p>Include a statement that the City will develop, keep current, and include in the SWMP as a revision, a list of staff who should be trained in the implementation of each BMP.</p> <p>Delete this effectiveness measure and develop a new measure as part of the City's program effectiveness assessment strategy.</p>
124	6.2.3, 6.3, & Table 6-3	Measurable Goals	<p>The measurable goals in Section 6.2.3, Section 6.3, and Table 6-3 do not agree.</p>	<p>Modify Table 6-3 to include the following measurable goals:</p> <ul style="list-style-type: none"> Develop and distribute a fact sheet to all relevant personnel on all BMPs currently adopted and in use by the City, starting in year 1 and updated annually; Prepare materials for training relevant staff in the proper implementation of BMPs, beginning in year 2 and updated annually; and Conduct annual training for all relevant staff based on the training materials (years 2 through 5).

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125	6.2.4, 6.3, & Table 6-3	Street Sweeping	The measurable goals in Section 6.2.4, Section 6.3, and Table 6-3 do not agree. In addition, some of the measurable goals are not specific and/or numeric.	<p>Modify Table 6-3 to include the following measurable goals:</p> <ul style="list-style-type: none"> • Sweep City streets and City-owned public parking lots twice per month (years 1 through 5); • Evaluate the effectiveness of the sweeping program annually, and modify it as necessary (years 1 through 5); and • Discharge no wastes or water into the storm drain system (years 1 through 5).
126	6.2.4, 6.3, & Table 6-3	Street Sweeping	The SWMP does not include a specific numeric measurable goal for sidewalk sweeping.	<p>Include a measurable goal for sidewalk sweeping (such as inspecting downtown sidewalks weekly to determine the need for sweeping).</p> <p>Include these statements in Table 6-3 as effectiveness measures.</p>
127	6.2.5, 6.3, & Table 6-3	Storm Drain Cleaning	Documenting the area/miles swept and documenting the amount of material removed are effectiveness measures, not measurable goals.	<p>Modify Table 6-3 to include the following measurable goals:</p> <ul style="list-style-type: none"> • Clean storm drain inlets, catch basins, and pipelines prior to the rainy season each year, and as needed (years 1 through 5); and • Determine the cost-effectiveness of regular storm drain system cleaning using a Vactor truck. <p>Include these statements in Table 6-3 as effectiveness measures.</p>

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128	6.2.6, 6.3, & Table 6-3	Trash	The measurable goals in Section 6.2.6, Section 6.3, and Table 6-3 do not agree.	Modify Table 6-3 to state that the City will empty public trash receptacles 4 times per week, and as needed; and evaluate the effectiveness of the public trash receptacle activity, and modify it as needed.
129	6.2.7, 6.3, & Table 6-3	Landscaping, Parks, and Open Space Maintenance	These activities appear to be included already in Tables 6-1 and 6-2 and the City-wide BMPs program.	If the landscaping, parks, and open space maintenance activity is already included in the City-wide BMPs program, delete Section 6.2.7 from the SWMP, as well as the paragraph in Section 6.3 and the line in Table 6-3 that refer to them.
130	7.0	Purpose of Monitoring and Reporting	The SWMP states that the purpose of monitoring and reporting is to document successful implementation of BMPs. This is only partially correct. The purpose of monitoring and reporting is also to determine the program's effectiveness at reducing pollutants to the MEP and protecting water quality.	Modify the SWMP to include the statement that the purpose of monitoring and reporting includes determining the program's effectiveness at reducing pollutants to the MEP and protecting water quality.
131	7.0	Data Collected	The SWMP lists four types of data the City will collect as it implements its stormwater program. However, the SWMP does not list other types of data the City must also collect.	Modify the list of data types collected to include the following elements: <ul style="list-style-type: none"> • Information regarding the City's implementation of BMPs specified in the SWMP; • Information regarding the City's progress toward measurable goals identified in the SWMP; • Information regarding the effectiveness of BMPs, according to effectiveness measures identified in the SWMP for each BMP; and • Information regarding BMPs' effectiveness at reducing pollutants to the MEP and protecting water quality.

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132	7.0	Information Reported	The SWMP does not state that the City will provide information in the annual report that is required by the General Permit (General Permit Section F.1).	<ul style="list-style-type: none"> • The status of compliance with General Permit conditions; • An assessment of the appropriateness and effectiveness of identified BMPs; • The status of the identified measurable goals; • Results of information collected and analyzed, including monitoring data, if any, during the reporting period; • A summary of stormwater activities the City plans to undertake during the next reporting cycle; • Any proposed change(s) to the SWMP along with a justification for the changes; • A change in the person or persons implementing and coordinating the SWMP; and • The effectiveness of each BMP, particularly its effectiveness at reducing pollutants to the MEP and protecting water quality.
133	Appendix A	Measures to Be Considered	The SWMP contains an extensive list of site planning measures, source control measures, and treatment measures the City will consider in its review of City land use policies and design guidelines. However, the list is not complete.	<ul style="list-style-type: none"> • Riparian and wetland buffers; • Minimizing soil disturbance; • Preserving natural vegetation; • Preserving trees; • Preserving natural topography, drainage patterns, and stream channels; • Protecting steep slopes; • Preserving hydrologically functioning areas

Item Number	SWMP Section	Subject	Issue	Required Revision
			(floodplains, recharge zones, wetlands, topography, channel shape and slope); and	
134	Appendix B	Storm Drain Atlas	The Storm Drain Atlas does not have a legend.	<ul style="list-style-type: none">• Providing pet waste controls.• Add a legend to the Storm Drain Atlas.

